# MIRICK O'CONNELL

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June 5, 2020

## VIA FEDERAL EXPRESS

Honorable John K. Sherwood, U.S.B.J. United States Bankruptcy Court Martin Luther King, Jr. Federal Building & Courthouse 50 Walnut Street, Third Floor Newark, NJ 07102

Re: In re: New England Motor Freight, Inc., et al. Chapter 11; Case No. 19-12809 (JKS)

Dear Judge Sherwood:

This office represents Jamie Magarian and Regina Magarian. The terms of the Auto Liability Claims Protocol Settlement Agreement ("Protocol") state that during the ninety (90) days following the Effective Date, "the Holders of Auto Liability Claims and the Insurers shall engage in cooperative, informal exchanges and requests for information and other discovery, in a good faith effort to resolve the Auto Liability Claims." Any claims not settled within the ninety (90) day period shall be submitted to mandatory mediation.

The initial ninety (90) day period elapsed without resolution of the claim. Accordingly, please accept this mediation request. Pursuant to the terms of the Protocol, this referral shall occur automatically upon this request, without further action required of the Court.

Copies of this letter have been mailed to the persons listed below.

FILED JEANNE A. NAUGHTON, CLERK

JUN 0,9 2020

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Please let me know if any other parties need to be notified of this request.

Very truly yours

Edward C. Bassett, Jr Esq. Mirick O'Connell

Attorneys for Jamie Magarian

and Regina Magarian

## ECB/kjg

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